# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA COLUMBIA, SOUTH CAROLINA

11966

HEARING #21-1/1968

DECEMBER 2, 2021

10:00 A.M.

#### ND-2021-34-E:

**SOUTH CAROLINA OFFICE OF REGULATORY STAFF** — Request by the Public Service Commission for an Allowable Ex Parte Briefing Regarding the Office of Regulatory Staff's Oversight of the South Carolina Public Service Authority (Santee Cooper), to Include Providing a High-Level Overview of Santee Cooper and an Update on Related Prospective Statutory Authority of the Commission.

# ALLOWABLE EX PARTE BRIEFING

COMMISSION MEMBERS PRESENT: Justin T. WILLIAMS, CHAIRMAN Florence P. Belser, Vice Chair; and Commissioners Carolyn L. 'Carolee' Williams, Stephen M. 'Mike' Caston, Thomas J. 'Tom' Ervin<sup>[A/V]</sup>, Headen B. Thomas, and Delton W. Powers, JR. [A/V]

ADVISOR TO COMMISSION: Jo Anne Wessinger Hill GENERAL COUNSEL

STAFF PRESENT: Jocelyn Boyd, Chief Clerk/Executive Director; Sharon P. Besley, Esq., Legal Staff; John Powers, Technical Advisory Staff; Jackie Thomas, Information Technology Staff; Melissa Purvis and Gwen Richardson, Livestream Technical Staff; Officer Joe Biggs; and Jo Elizabeth M. Wheat, CVR-CM/M|GNSC, Court Reporter

#### **APPEARANCES:**

BENJAMIN P. MUSTIAN, ESQUIRE, legal representative of/for the South Carolina Office of Regulatory Staff, together with PRESENTER DAWN M. HIPP [Chief Operating Officer]

JOHN REAGLE, ESQUIRE, Designated Neutral

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Please note the following inclusions/attachments to the record:
Office of Regulatory Staff's Presentation Slides (PDF)

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### PROCEEDINGS

CHAIRMAN J. WILLIAMS: Good morning, ladies and gentlemen. Welcome to the Public Service Commission of South Carolina. We're here for an allowable ex parte briefing offered or presented by the Office of Regulatory Staff. Today is December 2nd — Thursday, December 2nd. It's 10 a.m.

Present in the hearing room are Commissioners

J. Williams, C. Williams, Caston, Belser, and

Thomas. Joining us virtually we have Commissioners

Ervin and Powers.

General Counsel Wessinger Hill?

MS. HILL: Thank you, Mr. Chairman. Good morning, Commissioners, and to all who are present in person and virtually.

Today, Thursday, December 2nd, we are here in the Commission's hearing room pursuant to a Notice of Request for Allowable Ex Parte Briefing from the Office of Regulatory Staff regarding its oversight of the South Carolina Public Service Authority which is also commonly known as Santee Cooper. The subject matter to be discussed at the briefing today is related to the Office of Regulatory Staff's oversight for Santee Cooper and any special information on Santee Cooper's operations, and an

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update on the statutory authority given to the
Public Service Commission in terms of the
Commission's responsibilities regarding Santee
Cooper prospectively, beginning January 1, 2022.
This is a briefing and not a hearing. The

briefing must be conducted in compliance with the provisions of South Carolina Code Section 58-3-260(C). The requirements of the statute are, in part, that the allowable ex parte be confined to the subject matter which has been noticed; and for this briefing, the notice issued actually says as follows: The scope is the Office of Regulatory Staff's oversight of Santee Cooper and any special information on Santee Cooper's operations, and an update on the statutory authority given to the Public Service Commission in terms of the Commission's responsibilities regarding Santee Cooper, prospectively.

I, therefore, ask that any presenters,

Commissioners, and Staff all please refrain from

discussing any matters not related to this specific
topic.

Secondly, the statute prohibits any presenter, Commissioners, or Commission Staff from requesting or giving any commitment, predetermination, or

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prediction regarding any action by any Commissioner as to any ultimate issue which either is or is likely to come before the Commission.

Third, I would ask that the presenters, Commissioners, and Staff refrain from referencing any report, article, statute, or document of any kind that are not included in today's presentation. A copy of any document which is referenced during the briefing must be provided to the Office of Regulatory Staff<sub>[sic]</sub> for inclusion in the record which may be certified to the Chief Clerk of the Commission, which is Ms. Jocelyn Boyd. And for correction, I mean our Neutral today is Mr. John Reagle, so it would be certified by him and not the Office of Regulatory Staff.

Fourth, if anyone, during the course of this briefing, exceeds the scope or does not comply with or fails to conduct themselves within the provisions of the South Carolina Code Section 58-3-260 governing allowable ex parte briefings, it is expected for a contemporaneous objection to be made.

And, finally, everyone in attendance today, in person or virtually, must sign in or register; everyone in the hearing room or watching live

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virtually must also read, sign, and return the form which you were given at the door when you came in today, or the form will be e-mailed to you for virtual appearance. The form does include instructions and a deadline for return of the form. It is required by law for each attendee, whether virtually appearing or in person, to certify that the requirements contained in Section 58-3-260(C) governing the allowable ex parte briefing have been complied with at this presentation.

I thank you-all for your time and attention, and thank you, Mr. Chairman. The docket is in order for the briefing.

CHAIRMAN J. WILLIAMS: All right. Office of Regulatory Staff.

MS. DAWN HIPP [ORS]: Good morning, Chairman and other Commissioners. My name is Dawn Hipp, and I am the Chief Operating Officer for the Office of Regulatory Staff, and I'm pleased to be here with you today.

Given the parameters of the briefing, I'm hoping that we can have an informal discussion about our duties under the Act. If you have questions while I go through the briefing, feel free to stop and ask, and I'll do my best to answer

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1	those questions.	
2	I'd really l	iŀ

I'd really like to start with some introductions from the Office of Regulatory Staff.

Here with me today from our Legal Department is Ben Mustian and Donna Rhaney.

MS. RHANEY: [Indicating.]

MS. DAWN HIPP [ORS]: And I'd also like to introduce our Santee Cooper Program Manager, Findlay Salter.

MR. FINDLAY SALTER [ORS]: [Indicating.]

MS. DAWN HIPP [ORS]: He's joining — he recently joined ORS, and he will be the lead on the Santee Cooper project for ORS. And so I just wanted to make sure you had an opportunity to see him face-to-face. I'm sure you'll see him in the future. But we're pleased to have him on board with the Office of Regulatory Staff.

It's always a pleasure to come before you, whether it be in a hearing or here in an allowable ex parte. I thought I'd take a couple of minutes to — oh, here we go.

[Reference: ORS Presentation Slide 1]
 If I'm not directing the pointer, please let
me know [indicating]. Does it go this way
[indicating]?

1	MS. HILL: It should be able to point
2	anywhere.
3	MS. DAWN HIPP [ORS]: [Indicating.] There we
4	go. I thought I'd take just a few minutes and run
5	through the ORS mission. You hear it often, when
6	we present to you in utility rate matters. We've
7	tried to synthesize it down into some very salient
8	points, and that is that we are representing all
9	customer classes and we're looking at the
10	investment in reliable and high-quality service.
11	And so, for customers of Santee Cooper, that will
12	be no different. While we don't have jurisdiction
13	over consumer complaints from Santee Cooper, Santee
14	Cooper's customers, we do hear from them and we try
15	to resolve those as best as we can.
16	As you know, our mission had changed in 2018.
17	And since that time —
18	[Reference: ORS Presentation Slide 3]
19	<ul><li>ORS has been very busy. You have seen us,</li></ul>
20	in the last year, in front of you in approximately
21	a little bit under 100 cases. And in that time
22	period, we saved customers over \$20 million by our
23	work in cases before you. Since ORS started, in
24	2004, with activities in 2005, we've saved
25	customers over \$1.9 billion in utility rates. Last

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year, alone, the ORS and the ORS Staff, which is small but mighty — we're a little bit under 100, around the 80-or-so number — performed approximately 533 regulatory audits and reviews. You've seen some of those; some of those have been in areas that are not within the Commission jurisdiction.

Today, though, I'd like to give you just a little bit of an overview of some of our other responsibilities. On the slide, you'll see our Consumer Services Department. That is the group that has hands-on, direct contact with consumers of utilities. And in the last year, they recovered almost \$250,000 on behalf of consumers through informal dispute resolution with our regulated utilities. They conducted approximately 40 meteraccuracy tests, and they distributed almost 45,000 pieces of consumer education and participated in presentations both virtual and in person.

Our Safety Department, as seen on the slide, is a combination of pipeline safety and rail safety. And those two groups conducted 400 — over 400 safety inspections last year and gave 20 presentations and provided technical assistance both to the regulated pipeline companies and also

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the railroads.

Our transportation group is a small group, but they regulate, as you know, almost 180 household goods carriers and many, many more passenger carriers. They conducted almost 3000 inspections last year and provided over 12,000 instances of technical assistance to those regulated entities and those looking to do business in South Carolina.

Our telecommunications group works with customers that are hearing- or speech-impaired, and they distributed over 1400 pieces of equipment.

And our Energy Office, which is an unregulated body housed within the Office of Regulatory Staff, had reached 700 people last year with presentations, while reporting over \$7 million in energy savings through their actions and grants or loans or working with the public.

And you've heard about our broadband group.

We have a newly formed broadband office under the Office of Regulatory Staff, and they have been busy with mapping, administering CARES Act funding to provide students with access to the Internet during the pandemic, and are currently administering about \$30 million in grant funding for infrastructure development.

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And those are groups that you don't often hear from, and I thought it might be a good idea to give you just a brief overview before we hit the topic at hand, which is Santee Cooper.

[Reference: ORS Presentation Slide 4]

We began our work — ORS has been working with

Santee Cooper since the inception on various

projects. Santee Cooper assisted us with the State

Energy Plan, as you are aware. But back in 2019

under Act 95, we were asked to perform an

evaluation of the rate base attributed to Santee

Cooper, related to V.C. Summer Units 2 and 3, and

whether or not that rate base was used and useful.

And that information that our Staff, both our Audit

Staff and our Energy Staff looked at, was used in

the discussions about the procurement and what to

do with Santee Cooper under Act 95.

So we had started back in 2019 interfacing with the Santee Cooper team, and our actions continued in 2020. In 2020, under Act 135, ORS was requested to perform monthly reviews of Santee Cooper's activities under Section -11(E), which is a fairly nebulous section in Act 135, but we were looking at 11 areas and our review of those areas was to see if Santee Cooper was in compliance with

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the requirements of Act 135.

We were looking at the closure of the Winyah Generating Station, so every month Santee Cooper would provide us a report or respond to questions that were asked by ORS, and we would take a look at the closure and their activities related to the closure of the Winyah Generating Station; their deployment of new solar, which you heard from them about; agreements with their neighboring utilities, both operational and management agreements; their agreements with coal suppliers and transportation suppliers, we performed a review on those; their natural gas hedging arrangements; their development of new natural gas transportation and power transmission, and what activities they were looking — undertaking there; their purchased-power agreements that were entered into or changed during their review period; resolutions of any lawsuits; any steps they took to comply or change their business operations due to COVID-19; their financing arrangements and their debt defeasance, any sort of issuance of debt or refunding of debt; and, finally, any actions that they may have taken related to the rate freeze in accordance with the Cook settlement that the company had entered into.

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Re: Santee Cooper & PSC Prospective Regulation
We completed those 11 monthly reviews and we
reviewed over 10,000 pages of documents. And in
that, we discovered that Santee Cooper was in
compliance with the tenets of Act 135 under ORS's
review. Santee Cooper had to stand up a very
robust process in order to respond to the ORS
information requests and provide information to
ORS. Both Santee Cooper and ORS have posted that
information on their website for the public to
view. And we've provided you a link within the
presentation to our monthly reviews.
[Reference: ORS Presentation Slide 5]
So that's historically what ORS has done
within the past couple of years with Santee Cooper

So that's historically what ORS has done within the past couple of years with Santee Cooper. Under Act 90, we'll take on some new responsibilities, and we'll talk about the new responsibilities in terms of what is within the Commission's jurisdiction and what is within ORS's oversight.

And so this first slide talks about the new responsibilities that ORS will undertake. In particular, we'll be looking at Santee Cooper's retail rate schedules and rate changes. So when the *Cook* settlement expires in 2024 time period, Santee Cooper will be in a position, should they

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choose, to change or adjust any of their rates, and ORS will be involved in that process. And that process, as identified in Act 90, appears to be very similar to the Commission's process for ratesetting. In substitution of the Commission, of course, is the Board of Directors of Santee Cooper, but the legislation was careful to make sure that the process was transparent, that customers had a voice, that both ORS and the Consumer Advocate were involved: ORS in an audit-investigation-reviewand-report role, and the Consumer Advocate has an opportunity to participate in the process in front of the Board of Directors.

It appears that the process in front of the Board of Directors related to the retail rate schedule is going to take approximately six months from beginning to end.

The other section that ORS has responsibility over is to take a look at Santee Cooper's Annual Pricing Principle Report. Under the Act, Santee Cooper has established some pricing principles and they have to publish those and actions that they've taken relating to the pricing principles and provide that to ORS for review and comment. And so we will begin to do that in 2023, when those duties

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1	become — I'm sorry — in 2022, when those duties
2	become effective.
3	Any questions up to this point?
4	[No response.]
5	Okay. I will continue.
6	[Reference: ORS Presentation Slide 6]

The next slide is just a graphic of the items that the Commission will consider for Santee Cooper on a going-forward basis, and there are many. Many of them, Santee Cooper was added to our already-regulated-utility code section, and so — and those are around the service territory changes. If — Santee Cooper now has the ability to make service territory changes under the purview of the Commission, and so you will be seeing those in the future.

Under the Major Utility Facility Siting Act,
Santee Cooper was exempt from that; they are now
included in that, with some select exemptions for
transmission related to Winyah or transmission
started before a certain time period. And so
you'll see the major utility facility siting. Now,
Santee Cooper does have some unique review aspects
that the Commission has to consider under Act 90,
and those items are looking at "least ratepayer"

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risk," "most beneficial," and so some of that
language does not translate into your regulation of
the investor-owned utilities but is very specific
to Santee Cooper.

The acquisition of a major utility facility requires approval of this Commission. So if Santee Cooper were interested in making such acquisition, they would have to seek approval under the Act with the Commission.

The Commission is required to approve purchased-power agreements for Santee Cooper that exceed a certain time limit, and so you will be seeing those. Right now, the purchased-power agreements related to renewables, specifically, do not require Commission approval but Commission acceptance. And the Commission will have to approve any purchased-power agreement greater than ten years for Santee Cooper.

VICE CHAIR BELSER: Ms. Hipp?

MS. DAWN HIPP [ORS]: Yes, ma'am.

VICE CHAIR BELSER: Under that purchased-power agreement, those are just intrastate? Those are not anything that would come under FERC jurisdiction; is that —

MS. DAWN HIPP [ORS]: That is -

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1	VICE CHAIR BELSER: — correct?
2	MS. DAWN HIPP [ORS]: — correct. That is an
3	exemption or a limitation within the statute.
4	VICE CHAIR BELSER: Thank you.
5	MS. DAWN HIPP [ORS]: The Commission will also
6	be reviewing and approving the competitive
7	procurement program that Santee Cooper proposes for
8	approval. I think you heard from Santee Cooper
9	that they have used an RFP or a request-for-
0	proposal process to recently acquire solar, and it

And then, finally, the Commission will consider the integrated resource plan for Santee So you're working your way through that Cooper. process right now with our investor-owned utilities, and Santee Cooper will be considered in a very similar manner. Again, Santee Cooper does have some unique characteristics that the Commission will need to consider, related to their And they're customer-focused, they're costfocused, and they're, to use — they're comparativefocused.

is expected that the process will look very similar

to what Santee Cooper has used in the past.

seems to meet those requirements.

Any questions on this slide?

1	<b>COMMISSIONER ERVIN</b> [A/V]: I have a question.
2	When does the Santee Cooper IRP process begin, and
3	do you have some type of proposed procedural
4	schedule to kick off that process?
5	MS. DAWN HIPP [ORS]: The Act becomes
6	effective on January 1, 2022. So, according to
7	Santee Cooper's requirements in the Act, they have
8	to engage in stakeholder-engagement activities
9	prior to filing the IRP. And ORS's expectation —
10	we've had conversations with Santee Cooper, but
11	it's expected that those stakeholder discussions
12	will last probably over the year of 2022, and the
13	Commission could see an IRP, you know, after the
14	stakeholder-engagement sessions are concluded. So
15	close of 2022, early 2023.
16	COMMISSIONER ERVIN <sup>[A/V]</sup> : Thank you.
17	MS. DAWN HIPP [ORS]: You're welcome.
18	[Reference: ORS Presentation Slide 7]
19	All right. Just to wrap it up, we've given
20	some hyperlinks to the Commission, related to
21	things that we have mentioned in our briefing, such
22	that you've got those to take a look at.
23	[Reference: ORS Presentation Slide 8]
24	And then, I'll be short and sweet, if anyone
25	has questions related to our activities with Santee

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Cooper. I'll be glad to answer.

CHAIRMAN J. WILLIAMS: Good morning, Ms. Hipp.
Thank you for being here today. I just have a few questions for you. Do you have any concerns regarding the working relationship between the Office of Regulatory Staff and Santee Cooper, in terms of transparency, willingness to participate in discovery, embracing the new role that you-all have in regulating Santee Cooper?

MS. DAWN HIPP [ORS]: I don't. I don't. I think it'll be a learning curve, Chairman Williams. You know, there was certainly a learning curve when we worked with Santee Cooper under Act 95 and then again in Act 135. We have a good, good working relationship with them.

They've also, I think as you've heard, have staffed to be able to work on these new initiatives and embrace and learn the regulatory process. We have a successful track record working with Santee Cooper, coming out of some broadband dark-fiber leasing, that we've done with them; also, the State Energy Plan; our work with them on emergency management. And so we expect to continue that they are — I don't want to say they're excited, but they do provide a high level of information and quality

1	information when we ask questions. And they are
2	eager to talk about things or ask questions before
3	the issue even will come before the Commission or
4	comes to ORS's attention, and we appreciate that.
5	CHAIRMAN J. WILLIAMS: Outstanding. Could you
6	go back to your Act 90 slide, please, ma'am?
7	MS. DAWN HIPP [ORS]: Certainly. Would you
8	like it on the screen or
9	CHAIRMAN J. WILLIAMS: Yes, ma'am, if you
10	don't mind. If you can — I don't know if you
11	control that. Is that —
12	MS. DAWN HIPP [ORS]: I don't know if I can.
13	I have it in front of me, though.
14	CHAIRMAN J. WILLIAMS: They're telling me you
15	can go back.
16	MS. DAWN HIPP [ORS]: Okay [indicating].
17	CHAIRMAN J. WILLIAMS: One more?
18	MS. DAWN HIPP [ORS]: [Indicating.]
19	CHAIRMAN J. WILLIAMS: There, that one.
20	MS. DAWN HIPP [ORS]: There we go.
21	[Reference: ORS Presentation Slide 6]
22	CHAIRMAN J. WILLIAMS: So we have some new
23	responsibilities here, and you said that the
24	working relationship so far is very, very good —
25	which is great to hear. When it comes to the

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matters that Santee Cooper will have to present before the Commission, what can we do, if anything — because we're limited; we can't talk to them outside of the hearing room. What, if anything, can we do to make sure that, if there are any questions about, say, competitive procurement process, integrated resource plans, that there's not some sort of shock, regulatory shock, dealing with the new regulatory agency? Is there anything we can do or is that something you think that you can coach them through?

MS. DAWN HIPP [ORS]: I don't -

CHAIRMAN J. WILLIAMS: If they even need it.

They may not even need it.

MS. DAWN HIPP [ORS]: Yeah, no, I — they — our conversations with Santee Cooper have been very open and transparent. If they have a question about the regulatory process, even preceding the passage of Act 90 — how would this work, what does this look like — they come to us, they ask questions, we provide them examples, links to the DMS, links to your livestream, such that they can see how the process will work. I know they've been monitoring your integrated resource process.

And so, I don't - while it will be a learning

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curve, I don't think it will be a shock,
necessarily. I know they've been in contact with
our Legal Department to figure out your process and
procedure, such that their, you know, their time
before you and their interaction with the
Commission goes smoothly.

CHAIRMAN J. WILLIAMS: Okay. Very good to hear. Is there anything that we can do for you — for you or this process? Areas that we could offer more?

MS. DAWN HIPP [ORS]: I don't - I don't think
so.

CHAIRMAN J. WILLIAMS: Okay. I don't have any more questions.

Commissioner Williams?

COMMISSIONER C. WILLIAMS: Thank you, Chairman Williams.

Picking up on that, kind of, aspect of how do we work in a smooth kind of fashion, and looking at your slides and seeing, you know, what is being added to your responsibilities, our responsibilities, Santee Cooper's responsibilities, are there suggestions that you have regarding scheduling? I mean, we're finishing up a pretty full year, and this is just a really open-ended

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question but I'm wondering if there are things that we need to be aware of from our scheduling perspective that will help ensure that smooth and, you know, reasonable turnaround time with answers.

MS. DAWN HIPP [ORS]: It's a very good question. I'm not sure, necessarily, what the Commission can do. What we found to be very helpful is an open and transparent dialogue, prior to a filing or as the filing is being made, about procedures, procedural deadlines. And so if we can have the time to have those discussions with all of the parties, and present to the Commission some cohesive procedural deadlines, if we're able to do that, we would like the opportunity to facilitate that with Santee Cooper, as well. And that seems, you know, seems to help the process move along in a more smooth manner.

The only other thing I can think of procedurally relates to when a hearing will be convened and how much time each party intends to spend on, you know, their cross or putting up their case-in-chief. And there could be a way to look at the schedule, similar to what other states do, and ask parties to identify — it's not a hard and fast identification — time blocks that they see are

1	necessary, so that you can plan according to that.
2	COMMISSIONER C. WILLIAMS: Thank you. I
3	appreciate the answer and the ideas.
4	MS. DAWN HIPP [ORS]: You're welcome.
5	CHAIRMAN J. WILLIAMS: Any other questions for
6	Ms. Hipp?
7	[No response]
8	Ms. Hipp, that was a great suggestion about
9	time blocks. Don't be surprised if you see that in
10	the future. Is there anything else?
11	[No response]
12	All right. Thank you for being here.
13	MS. DAWN HIPP [ORS]: Thank you for having us.
14	[WHEREUPON, at 10:30 a.m., the
15	proceedings in the above-entitled matter
16	were adjourned.]
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## <u>C E R T I F I C A T E</u>

I, Jo Elizabeth M. Wheat, CVR-CM-GNSC, Notary
Public in and for the State of South Carolina, do hereby
certify that the foregoing is, to the best of my skill and
ability, a true and correct transcript of all the proceedings
had regarding a requested allowable ex parte briefing in the
above-captioned matter before the PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA;

IN WITNESS WHEREOF, I have hereunto set my hand and seal, on this the  $3^{rd}$  day of December , 2021.

Jo Elizabeth M. Wheat, CVR-CM/M|GNSC Hearings Reporter - Public Service Commission of South Carolina

Notary Public in/for the State of South Carolina My Commission expires: <u>January 12, 2031</u>.